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VIA ELECTRONIC MAIL and U.S. MAIL

Thomas Krueger
Associate Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Blvd. (C-14J)
Chicago, Illinois 60604-3590

Re: Ellsworth Industrial Park, Settlement Agreement and Order
Comments on U.S. EPA's Draft "Preliminary Planning Report"

Dear Mr. Krueger:

This letter is submitted on behalf of Scot, Incorporated ("Scot") with respect to its individual comments on the draft Preliminary Planning Report issued by U.S. EPA on January 20 and 27, 2006. These comments are being submitted at the same time, and are to be read together with, the comments submitted under separate cover from Bruce White, on behalf of all the private parties (the "Ellsworth Group") that signed the Settlement Agreement and Order, entered on or about September 29, 2005 ("SAO"), and from the Ellsworth Group's technical consultant Michael Baker Jr., Inc. The comments contained herein, as well as in the other referenced letters, shall not be construed in any manner whatsoever as an admission by Scot, in whole or in part, of liability or responsibility for conditions in or about the Ellsworth Industrial Park. Furthermore, these letters shall not be construed in any manner whatsoever as an admission or acknowledgement, in whole or in part, that the draft PPR is necessary or appropriate, that it complies with applicable laws, regulations or Agency guidance, or that it is consistent with the requirements of the SAO or the Agreement in Principle (July 2003).

1) **Passive Soil Gas Survey.** The U.S. EPA has proposed conducting passive soil vapor surveys as a method of delineating chlorinated solvent compounds present in soil and "to select where additional soil borings and sampling should occur." The surveys are proposed within utility corridors, beneath building slabs, and on exterior areas at targeted properties. We would suggest that the U.S. EPA consider installing the first "row" of exterior sampling locations within one to two feet of the building foundations, rather than some distance from the buildings, as

it appears to show on the proposed sample location maps. This is for the following reasons:

a. Soil vapor surveys are most effective in unsaturated, porous media. Once away from the building foundations, the surficial and immediately underlying soil within much of Ellsworth Industrial Park is clay. Thus, unless the investigator is fortuitous enough to actually install a probe directly in an area on any given site where solvent was disposed on the ground surface, it is highly unlikely that detection of a release from lateral migration of vapors will occur, due to the clay-rich soil predominant in the area. In short, installing vapor probes three feet below the surface into clay rich soil with the expectation of finding or delineating a solvent release (absent a specific reason to do so, *i.e.*, a tank or known surface spill) is not an efficient use of the technology.

b. Experience has shown that most indiscriminant exterior dumping commonly occurred on non-paved areas immediately outside doors and/or along building foundations where the solvent or liquid being disposed was able to soak into the ground. Aside from the obvious issue of killing grass in landscaped areas or ponding of liquids on parking lots or clay-rich soil, it was simply more time-efficient to dispose of solvent immediately outside the "back door" and along the building foundations.

c. The U.S. EPA has proposed some sub-slab testing as well. We would suggest that exterior testing along the building foundations compliments the sub-slab investigation. Solvents either deliberately disposed via holes in the concrete floor or into leaky sewer lines will migrate laterally and downward, provided there is sufficiently porous media within which to do so. As excavations depths along perimeter foundations are typically deeper than beneath the adjacent building floor slabs, fugitive solvents and liquids can migrate laterally and downward until no longer able to do so. Thus sub-slab spills or dumping that may have originated within the footprint of the building are detectable within the exterior foundation areas.

We are not suggesting the U.S. EPA eliminate the planned testing of the exterior areas, only that the effort be conducted in a manner that maximizes the potential for discovering release areas at each of the targeted properties.

2) **Bedrock Groundwater Elevations**. The potentiometric surfaces shown on Figures 2-10, 2-11, and 2-12 in the January 2006 Preliminary Planning Report

requires invoking rather uncommon hydrogeologic conditions. Given the proposed lateral continuity within the bedrock aquifer, the presence of groundwater elevation contours showing isolated "mounds" or "drainage holes" would not appear to be credible, lacking some underlying cause such as an adjacent groundwater pumping well. As an attempt at resolution, at a minimum, the top of casing elevations for all monitoring wells should be re-surveyed to NAVD88 or some logical equivalent. In addition, we would suggest installing a bedrock monitoring well within the middle of the area defined by BD-02D, BD-12D, BD-14D, and BD-8D. This would also help define the size of the apparent groundwater mound defined solely by BD-14D.

3) **2537 Curtiss Street**. In addition to the sub-slab vapor probes as proposed in the Work Plan, additional vapor probes should be located beneath the area of the loading dock located in the northeast corner of the building and along the building's exterior foundation in a manner consistent with Comment 1, above. In addition, the Work Plan calls for 5 soil borings in the area between 2537 Curtiss Street and 2525 Curtiss Street. Presumably, these are to investigate the detection of PCE in GP-41, located between the two buildings. However, these proposed locations do not resolve the issue of source. As shallow groundwater in this area appears to flow in the general direction of 2525 Curtiss, to adequately assess the presumed source area, additional soil borings may be needed beneath the floor slab in the area of the loading dock in the northeast corner of 2537 Curtiss Street.

4) **Downers Grove National Bank Property**. This property is located in the southeast corner of Curtiss and Katrine Streets and is also known as the Fusibond property. In the August 2002 U.S. EPA Site Assessment report, there are references to the presence of waste storage areas beneath what is now building slab. At a minimum, three soil vapor probes need to be located beneath the floor slab at this property, with additional consideration given to a minimum of two soil borings to investigate the statement in the U.S. EPA report.

If you would like to discuss any of these issues further or need further information, please contact me. Thank you for your consideration.

Sincerely,

Edward V. Walsh, III/cap

Edward V. Walsh, III